
BOSTON GAS COMPANY, COLONIAL GAS COMPANY,
AND ESSEX GAS COMPANY D/B/A/ KEYSpan ENERGY DELIVERY

D.T.E. 04-9

SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO
BOSTON GAS COMPANY, COLONIAL GAS COMPANY,
AND ESSEX GAS COMPANY D/B/A/ KEYSpan ENERGY DELIVERY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Boston Gas Company, Colonial Gas Company, and Essex Gas Company, d/b/a/ Keyspan Energy Delivery New England (“Keyspan” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and

basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and with all parties; also submit one (1) copies of the responses to John J. Geary, Hearing Officer, one (1) copy of the responses to Andreas Thanos, Assistant Director, Gas Division; one (1) copy of the responses to Alexander Kofitse, Analyst, Gas Division; one (1) copy of the responses to Marilyn Ross, Analyst, Gas Division; and one (1) copy of the responses to Kenneth Dell Orto, Analyst, Gas Division.
8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due by the close of business (5:00 p.m.) Friday, May 14, 2004.

INFORMATION REQUESTS

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| DTE 2-1 | Refer to Keyspan’s explanatory statement at 4. The Company states that Entergy-Koch Trading, LP (“EKT”) will manage certain Keyspan assets. Please identify the specific assets EKT will manage over the course of the contract. |
| DTE 2-2 | Please refer to Keyspan’s explanatory statement at 4, n.4. Please discuss in detail the terms and substance of the discussions between the Company and EKT. |
| DTE 2-3 | Refer to Keyspan’s explanatory statement at 5, and to Article IV of the agreement. |

- (a) Describe the circumstances under which EKT may be allowed access to Keyspan resources not part of the Resource Portfolio.
- (b) Identify the specific resources EKT may be allowed access to under section 4.2 of the Agreement.
- (c) Describe how Keyspan determines whether or not to grant EKT access to additional resources.

DTE 2-4 Refer to Article VI of the Agreement. Has Keyspan opted to continue the agreement without change (Option 1); or has Keyspan opted to convert the agreement to a structure whereby the Company, rather than EKT, would manage the resource portfolio and purchase the required city gate supplies for its sales customers with EKT acting in an advisory role (Option 2) for the period April 1, 2004 through March 31, 2006?